

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

IN RE JP MORGAN CHASE & CO. SECURITIES
LITIGATION

This Document Relates to:

Blau v. Harrison, et al., No. 04 C 6592

MDL No. 1783

Master Docket No. 06 C 4674

Judge David H. Coar

Magistrate Judge Martin C. Ashman

**PLAINTIFF'S MOTION FOR AN AWARD OF ATTORNEYS' FEES,
REIMBURSEMENT OF EXPENSES AND LEAD PLAINTIFF AWARD**

Lead Plaintiff respectfully moves this Court for entry of an Order: (a) awarding his counsel attorneys' fees of \$7.5 million; (b) awarding his counsel \$415,000 for reimbursement of expenses incurred in this litigation; and (c) awarding lead plaintiff \$2,695 for reimbursement of his costs and expenses under the Private Securities Litigation Reform Act of 1995, 15 U.S.C. § 78u-4(a)(4).

In support of his motion, plaintiff is filing concurrently herewith: (a) *Statement in Support of an Award of Attorneys' Fees and Expenses* (annexed as Tab A to the parties' Local Rule 54.3 Joint Statement); (b) the *Declaration of Demet Basar In Support of Plaintiff's Motion for an Award of Attorneys' Fees, Reimbursement of Expenses and Lead Plaintiff Award*.

WHEREFORE, plaintiff respectfully requests that the Court grant on Order granting the relief set forth above, as well as such other and further relief as the Court may deem just and proper.

Dated: September 16, 2008

Respectfully submitted,
**WOLF HALDENSTEIN ADLER
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